

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

<b>In the Matter of</b>	)	
	)	
<b>Revision of the Commissions' Rules to</b>	)	<b>CC Docket No. 94-102</b>
<b>Ensure Compatibility with Enhanced 911</b>	)	
<b>Emergency Calling Systems</b>	)	
	)	
<b>Phase II Compliance Deadlines for</b>	)	
<b>Non-Nationwide CMRS Carriers</b>	)	
 <b>To: Wireless Telecommunications Bureau</b>		

**REQUEST FOR ADDITIONAL LIMITED WAIVER  
AND EXTENSION OF THE HANDSET PENETRATION DEADLINE  
OF THE COMMISSION'S PHASE II E911 RULES**

Illinois Valley Cellular RSA 2-I Partnership, Illinois Valley Cellular RSA 2-II Partnership and Illinois Valley Cellular RSA 2-III Partnership (collectively "Illinois Valley Cellular"), by its attorneys and pursuant to 47 C.F.R. §1.925, hereby respectfully requests an additional limited waiver and extension of time to comply with Section 20.18(g)(1)(v) of the Commission's rules regarding Phase II of Enhanced 911 ("E911") services, 47 C.F.R. §20.18(g)(1)(v), which requires Tier III carriers who employ a handset-based Phase II solution to achieve a location-capable handset penetration rate among subscribers of at least 95%.<sup>1</sup>

Illinois Valley Cellular has acted diligently to encourage its rural subscribers to exchange

---

<sup>1</sup> Revision of Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling System, CC Docket 94-102, Order To Stay (released July 26, 2002).

older handsets for Phase II capable handsets. Those efforts have yielded a penetration level exceeding 90%, and Illinois Valley Cellular believes the 95% level is achievable within six months. The existing deadline of October 28, 2006 for achieving the 95% subscriber penetration requirement will not be met despite the carrier's best efforts at promoting subscriber handsets with automatic location identification ('ALI') features. For reasons stated herein, Illinois Valley Cellular respectfully requests an additional six months, until April 28, 2007, to meet the 95% penetration requirement.

## **I. Background**

Illinois Valley Cellular is a Tier III cellular carrier operating in portions of Illinois Rural Service Area 2B. Illinois Valley Cellular was conditionally granted an extension through October 28, 2006, to comply with Section 20.18(g)(1)(v) of FCC rules, 47 C.F.R. § 20.18(g)(1)(v), in *Order*, CC Docket No. 94-102, FCC 05-182, released October 28, 2005. New data reveals that Illinois Valley Cellular has achieved a location-capable handset penetration rate among subscribers of about 91.1%, but will not meet its projections of achieving a location-capable handset penetration rate among subscribers of 95% by October 28, 2006.

Illinois Valley Cellular operates a Code Division Multiple Access ("CDMA") digital network throughout its service area. All new construction is based on the CDMA air interface. Nevertheless, many subscribers remain dependent upon the legacy TDMA/analog network technology network. In support of the need for additional time to meet its 95% penetration deadline, the following is submitted.

## **II. Illinois Valley Cellular Has Demonstrated Good Faith in Complying with the E911 Requirements**

Illinois Valley Cellular has a history of compliance with the FCC's wireless E911 requirements. It has met all of the location-capable handset sale and activation benchmarks set forth in FCC Rule Section 20.18(g)(i)-(iv). Although 100% of all new digital handsets activated on Illinois Valley Cellular's system are location capable, customer acceptance of location capable handsets is slow. Illinois Valley Cellular has diligently encouraged subscribers to adopt personal equipment upgrades. Promotional campaigns have marketed new handsets and promoted the benefits of early renewal for TDMA and analog customers who trade in the old handsets. The campaigns have offered free phones with a contract. Direct mail alerts and targeted messages on customer invoices have informed customers of the advantages of upgrading to location capable handsets. Representatives in Illinois Valley Cellular's retail stores promote the benefits of location-capable phones. They affirmatively request customers to switch from analog and TDMA to the new CDMA system.

## **III. Illinois Valley Cellular Has Deployed E911 Phase II Data to all Requesting PSAPs**

Twenty-one Public Safety Answering Points ("PSAPs") are located within Illinois Valley Cellular's eight-county service area. Of those, thirteen have become capable of receiving and utilizing Phase II data, and Illinois Valley Cellular is transmitting E911 data to these capable PSAPs. Illinois Valley Cellular stands ready to working with the other eight PSAPs, on their schedule, to deploy Phase II services.

Illinois Valley Cellular maintains a dialogue with the PSAPs in its service area. All are aware of the ongoing subscriber conversion to location-capable handsets. No PSAP has expressed objection

or concern with Illinois Valley Cellular's 95% penetration schedule.

#### **IV. The Public Interest Will Be Served by Limited Waiver and Extension of the Penetration Deadline**

In light of the slower than anticipated pace of conversion of subscribers in adopting new location-capable handsets, Illinois Valley Cellular requests a further limited extension of the penetration deadline until April 28, 2007.

Grant of an additional limited waiver and extension of time for Illinois Valley Cellular to comply with 47 C.F.R. §20.18(g)(1)(v) would serve the public interest. An extension of the penetration deadline is warranted given the unique facts and circumstances of Illinois Valley Cellular's position. Section 106(a) of the Act requires the Commission is to grant a waiver to Tier III carriers "if strict enforcement of the 95% subscriber penetration requirements would result in consumers having decreased access to emergency services."<sup>2</sup> Indeed, Illinois Valley Cellular's analog and TDMA subscribers would be denied access to Phase II E911 services if Illinois Valley Cellular is required to prematurely deactivate existing TDMA service in order to comply with FCC rules. Similarly, CDMA customers using older, non-location handsets are better off being able to reach a 911 operator than being disconnected for failure to upgrade their phones to achieve E911 Phase II capabilities. Illinois Valley Cellular is, of course, obligated to continue to support analog service until February 18, 2008, in accordance with FCC Rule Section 22.901(b)

---

<sup>2</sup> In December 2004, Congress enacted the Ensuring Needed Help Arrives Near Callers Employing 911 Act of 2004 (*Enhance 911 Act*). The *Enhance 911 Act* directed the Commission to grant qualified Tier III carriers' requests for relief of the December 31, 2005 ninety-five percent penetration deadline for location-capable handsets, as set forth in Section 20.18(g)(1)(v) of the Commission's Rules, if "strict enforcement of the requirements of that section would result in consumers having decreased access to emergency services."

If not granted a further waiver, Illinois Valley Cellular will have to cease or mitigate TDMA operations in order to achieve the 95% penetration figure and avoid FCC enforcement action. Cellular coverage will be denied to persons who depend upon outdated communications services in rural areas, and who rely upon their legacy TDMA and older CDMA phones for safety and for elementary contact with other persons. Many of those subscribers are located on farmland and other isolated portions of the service area. Without their TDMA and other outdated handsets the customers would be unable to place calls, including calls to 911 for basic and Phase I emergency services.

These alternatives to waiver would invariably result in consumers having “decreased access to emergency services.” Because enforcement of the existing 95% deadline could result in forcing Illinois Valley Cellular to disconnect customers, minimize or deactivate its TDMA and/or analog networks and deprive subscribers of basic 911 services, Illinois Valley Cellular requests review under the *Enhance 911 Act* waiver standard.

In general, a waiver is appropriate whenever special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.<sup>3</sup> The Commission has established standards to be used when acting upon requests for a waiver of E911 deadlines and obligations.<sup>4</sup> The Commission has held that it will grant waiver requests that are specific, focused, and limited in scope, with a clear path to full compliance.<sup>5</sup> The Commission has stated that carriers

---

<sup>3</sup> 47 C.F.R. § 1.3; *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (citing *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969)).

<sup>4</sup> *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Fourth Memorandum Opinion and Order, 15 FCC Rcd 17442, 17457-58, paras. 43-44 (2000) (*E911 Fourth Memorandum Opinion and Order*).

<sup>5</sup> *E911 Fourth Memorandum Opinion and Order*, 15 FCC Rcd at 17458, para. 44.

should undertake concrete steps necessary to come as close as possible to full compliance and should document their efforts aimed at compliance in support of any waiver request.<sup>6</sup> As set forth below, Illinois Valley Cellular meets the Commission's standards. The circumstances underlying the request present a special case that justifies a further limited E911 Phase II waiver and extension.

**V. Illinois Valley Cellular Has a Plan to Achieve Compliance with the 95% Penetration Benchmark**

As stated, 100% of digital handsets that are newly activated on Illinois Valley Cellular's system are ALI-capable. Ongoing efforts to get customer to trade in old for new handsets have resulted in a drop of the percentage of TDMA handsets on the system from 3.33% to 2.21% over the past six months. During this period the percentage of analog handsets has dropped from 2.45% to 1.80%, and non-location capable CDMA handsets from 4.67% to 2.86%. The penetration rate of location-capable handsets has risen from 86.22% to 91.11%, at an average rate of about 0.8% per month. This progress has been difficult in the face of subscribers who adamantly insist upon keeping their TDMA, analog and older CDMA phones because they are more dependable, operate in a larger service range, or are already programmed with favorite phone numbers and customized features.

Illinois Valley Cellular expects that 95% of its subscribers will have ALI-capable handsets by April 28, 2007. The projected pace will permit Illinois Valley Cellular to continue to offer TDMA and analog services, while selling and activating only ALI-capable digital handsets.

Increase in Illinois Valley Cellular's penetration rate will be assisted with a campaign of sending individual notices to TDMA and analog users describing the planned phase-out of those

---

<sup>6</sup> *Id.*

technologies. Illinois Valley Cellular is informing these subscribers that support for obsolete handsets can no longer be assured and that the units cannot be repaired. Furthermore, monthly service rates on older handsets may be increased in early 2007. The TDMA and analog networks will be gradually dismantled, with TDMA diminishing through 2007 and analog as soon as mid-February 2008. This direct customer contact program should accelerate conversion of about 900 phones.

The rate will also be assisted by means within Illinois Valley Cellular's control, including the continued replacement of handsets donated to local schools. In response to the Columbine shootings 377 handsets were donated. Of those, 123 have been upgraded or terminated. Accelerated replacement of the rest of the donated phones will improve Illinois Valley Cellular's penetration rate.

At the same time Illinois Valley Cellular is augmenting its CDMA network with new CDMA-only cell sites. Three such new sites will be activated by the end of 2006. Over \$4 million dollars have been invested in the CDMA network during the past year. The improved CDMA signal coverage should encourage subscribers to switch to new CDMA handsets.

Illinois Valley Cellular will continue to conduct marketing campaigns, to offer free phones, and to otherwise encourage consumer adoption of new handsets with Phase II E911 capabilities. Given the rural character of Illinois Valley Cellular's market and, for the time being, the reliance by some subscribers upon TDMA and analog phones and service, it is necessary for Illinois Valley Cellular to respectfully request a further limited waiver and extension of the 95% penetration requirement.

### **Conclusion**

The foregoing reasons justify grant of a limited waiver of the Commission's Phase II E911

rules that will serve the public interest. Illinois Valley Cellular requests a temporary waiver and extension of time through April 28, 2007 to achieve a location-capable handset penetration rate among subscribers of at least 95%. The public interest benefit in this case equals or exceeds that which the Commission has found in other instances to be sufficient for waiver, and the request meets the standards of the *Enhance 911 Act*. Therefore Illinois Valley Cellular requests that a limited waiver and extension of Section 20.18(g)(1)(v) of FCC Rules be granted as proposed.

Respectfully submitted,

**Illinois Valley Cellular RSA 2-I Partnership,  
Illinois Valley Cellular RSA 2-II Partnership and  
Illinois Valley Cellular RSA 2-III Partnership**

A handwritten signature in cursive script, reading "Pamela L. Gist", is written over a horizontal line.

David L. Nace  
Pamela L. Gist

Its Attorneys

Lukas, Nace, Gutierrez & Sachs, Chartered  
1650 Tysons Boulevard, Suite 1500  
McLean, Virginia 22102  
(703) 584-8678

October 18, 2006



Penetration Rate Progress

#### 10/9/06 Billing File

Analog	752	1.80%
TDMA	919	2.21%
CDMA Non-GPS	1,191	2.86%
CDMA GPS	37,965	91.11% ✓
Unknown	844	2.03%
	41,671	100.00%

#### 9/19/06 Billing File

Analog	815	1.95%
TDMA	971	2.32%
CDMA Non-GPS	1,340	3.21%
CDMA GPS	37,629	90.05% ✓
Unknown	1,033	2.47%
	41,788	100.00%

#### 8/15/06 Billing File

Analog	856	2.04%
TDMA	1,037	2.47%
CDMA Non GPS	1,379	3.28%
CDMA	37,654	89.63% ✓
Unknown	1,083	2.58%
	42,009	100.00%

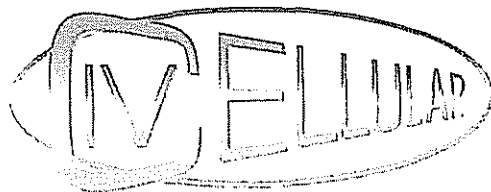
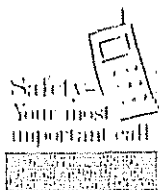
#### 7/10/06 Billing File

Analog	908	2.15%
TDMA	1,129	2.67%
CDMA Non-GPS	1,586	3.75%
CDMA GPS	37,475	88.66% ✓
Unknown	1,169	2.77%
	42,267	100.00%

#### 4/5/06 Billing File

Analog	1,053	2.45%
TDMA	1,431	3.33%
CDMA Non-GPS	2,006	4.67%
CDMA GPS	37,051	86.22% ✓
Unknown	1,434	3.34%
	42,975	100.00%

Direct Mail to TDMA/Analog Handset Subscribers



200 Riverfront Drive • Marseilles, IL 61341

(815) 795-3200  
(800) 438-4824  
FAX: (815) 795-2097

October 11, 2006

Dear Illinois Valley Cellular Customer,

At I V Cellular, we're always working to improve your wireless experience. In the past year we have invested over \$4 million dollars in our CDMA network. Plus we have added cell sites in our most rural areas to provide better coverage. The TDMA/Analog network used by your current phone will no longer be available in most areas of the Country as of February, 2008, and some TDMA and analog networks may be phased out during 2007. These networks have very limited capabilities and it is no longer possible for I V Cellular to provide the level of features and service that you, our customer, expects and deserves. In addition, most manufacturers no longer produce TDMA/Analog handsets. Due to this phase out of the TDMA/analog networks, all across the United States, you will need to switch your handset to a new CDMA phone.

We must advise you that if you have not replaced your handset by early December, IVC cannot guarantee service to you on that handset. These handsets cannot be repaired. They are obsolete and must be replaced to ensure operability. Many of the other carriers have already begun charging a surcharge of up to \$5.00 a month for customers who have these obsolete handsets. IVC has chosen not to do this at this time but may have no choice for those who are not in compliance by early next year. The FCC has required IVC to sell only CDMA GPS capable phones since October of 2005.

You can take advantage of IVC's new upgraded CDMA network and avoid intermittent or even no service, on your phone by switching to a new IVC CDMA handset today. Get a new phone and not only will we waive the standard \$15 upgrade fee, but you will also enjoy greater call clarity and have access to the best that IVC has to offer.

Upgrade to a new CDMA handset today. Just call 611 from your cellular phone or 815-795-3200 or visit your local IVC Agent or Wireless Solution Center. You will be able to start enjoying all the benefits of a new network and handset and as always, IVC has a wide variety of plans to fit your exact needs.

Thank you for choosing I V Cellular

Sincerely,

I V Cellular Corporate

*The Power to Communicate... **ON** EARLY*



200 Riverfront Drive • Marseilles, IL 61341

(815)795-3200  
(800)438-4824

## E - 9 1 1   A L E R T

January 2006

Dear Valued Customer:

Did you know that most Enhanced 911 (E911) systems have the capability of locating your wireless phone within 50 to 300 meters? If you were involved in a car accident or experiencing extreme winter weather conditions, wouldn't it be comforting to know that just by dialing 911 on your E911 capable wireless phone your local police could find you?

IV Cellular shares that desire. **We have checked our records and we show that your current phone is not E911 capable.** You can call 911 but it cannot pinpoint the exact location of the call. We highly recommend that you stop into one of our agent or retail stores to view our wide selection of location capable phones.

If you have any questions, you can call our Customer Relations Department at 800-438-4824 or by dialing 611 on your cellular phone.

Thank you for your prompt attention to this very important matter.

Sincerely,

*Thomas F Walsh*

Thomas F. Walsh  
General Manager

Invoice Notices Encouraging Handset Upgrades



200 Riverfront Drive  
Marseilles, IL 61341

www.ivcellular.com

**Illinois Valley Cellular**

Return Service Requested

☐ Check here for change of address.

LARRY COWIE  
441 W BLUFF ST

MARSEILLES, IL 61341-1409



## Remittance Section

Bill Date: 03/16/06  
Account Number: 815-795-0930.0  
Payment Due By: 04/07/06  
**Amount Due: 10.47**  
Amount Enclosed: \$

Please make check payable to: **Illinois Valley Cellular**

☐ Check here for credit card payments(see reverse for details)



Illinois Valley Cellular  
P O Box 219  
Marseilles, IL 61341-0219

*Payments not received by next bill date are subject to a \$10 late fee.*

*Please detach and return above portion with your payment*



**Illinois Valley Cellular**

## Account Information

Invoice Date:	03/16/06
Account Number:	815-795-0930.0
Due Date:	04/07/06
Previous Balance:	10.72
Payments/Credits:	-1.00
Balance Forward:	9.72
Late Payment Charge:	0.00
Current Charges:	0.75
<b>Amount Due:</b>	<b>10.47</b>

## Summary Of Charges

### Summary of Charges for LARRY COWIE

Previous Balance	10.72
Payments received thru 03/15/06	-1.00
<b>Balance Forward</b>	<b>9.72</b>

### Current Monthly Charges

Monthly Service Charges	0.00
Chargeable Text Messages and Downloads	8.59
<b>Total Current Monthly Charges</b>	<b>8.59</b>

### Taxes, Government Surcharges and Fees

Federal Tax	0.26
State Tax	0.60
Local Tax	0.52
Illinois State Wireless E-911 Surcharge	0.75
<b>Total Taxes, Government Surcharges and Fees</b>	<b>2.13</b>

### IVC Other Charges and Credits

Other Billing Adjustments	-9.97
<b>Total IVC Other Charges and Credits</b>	<b>-9.97</b>
<b>Total Amount Due by 04/07/06</b>	<b>10.47</b>

## Important Messages

### AMBER ALERT

The AMBER Alert Plan is a voluntary partnership between law enforcement and broadcasters to activate an urgent bulletin in the most serious child abduction cases. SMS text messages are sent to the handsets of the subscribers. Illinois Valley Cellular has become a recent participant in this program. You can sign up on our web site at [www.ivcellular.com](http://www.ivcellular.com) or call 611 and have one of our trained customer relations representatives walk you through the setup.

### ARE YOU SAFE IN AN EMERGENCY?

Unlike your home phone, some older model cell phones are unable to send location information during an emergency call. Bring your handset into your local Illinois Valley Cellular location and have them check to make sure your phone is E-911 compliant. *Plus, you may qualify for a free upgrade on new equipment.*

### YOUR ACCOUNT INFORMATION IS SAFE

Illinois Valley Cellular's business practices are certified with the FCC to protect your privacy. Recently there has been a lot of publicity in the news on agencies attempting to fraudulently obtain call detail information on customer accounts. This has prompted immediate action by the FCC to have all wireless carriers certify in writing the security measures they take as a business to protect the privacy of a customer's account information and most importantly their call detail information. Our business practices require authorization and verification before releasing any information on your IVC account. Please be patient with our representatives when making account inquiries. If you have any questions regarding our business policies on the security of your IVC account information, please call 611 or 1-800-438-4824.



200 Riverfront Drive  
Marseilles, IL 61341

www.ivcellular.com

**Illinois Valley Cellular**

Return Service Requested

☐ Check here for change of address.

LARRY COWIE  
441 W BLUFF ST

MARSEILLES, IL 61341-1409



## Remittance Section

Bill Date: 08/16/06  
Account Number: 815-795-0930.0  
Payment Due By: 09/07/06  
Amount Due: 0.75  
Amount Enclosed: \$

Please make check payable to: **Illinois Valley Cellular**

☐ Check here for credit card payments(see reverse for details)



Illinois Valley Cellular  
P O Box 219  
Marseilles, IL 61341-0219

*Payments not received by next bill date are subject to a \$10 late fee.*

*Please detach and return above portion with your payment*



**Illinois Valley Cellular**

## Account Information

Invoice Date:	08/16/06
Account Number:	815-795-0930.0
Due Date:	09/07/06
Previous Balance:	7.51
Payments/Credits:	-7.51
Balance Forward:	0.00
Late Payment Charge:	0.00
Current Charges:	0.75
Amount Due:	0.75

## Summary Of Charges

### Summary of Charges for LARRY COWIE

Previous Balance	7.51
Payments received thru 08/15/06	-7.51
<b>Balance Forward</b>	<b>0.00</b>
<b>Current Monthly Charges</b>	
Monthly Service Charges	0.00
<b>Total Current Monthly Charges</b>	<b>0.00</b>
<b>Taxes, Government Surcharges and Fees</b>	
Illinois State Wireless E-911 Surcharge	0.75
<b>Total Taxes, Government Surcharges and Fees</b>	<b>0.75</b>
<b>Total Amount Due by 09/07/06</b>	<b>0.75</b>

## Important Messages

### AMBER ALERT

The AMBER Alert Plan is a voluntary partnership between law enforcement and broadcasters to activate an urgent bulletin in the most serious child abduction cases. SMS text messages are sent to the handsets of the subscribers. Illinois Valley Cellular has become a recent participant in this program. You can sign up on our web site at [www.ivcellular.com](http://www.ivcellular.com) or call 611 and have one of our trained customer relations representatives walk you through the setup.

### ARE YOU SAFE IN AN EMERGENCY?

Unlike your home phone, some older model cell phones are unable to send location information during an emergency call. Bring your handset into your local Illinois Valley Cellular location and have them check to make sure your phone is E-911 compliant. *Plus, you may qualify for a free upgrade on new equipment.*



Enhanced 911 Phase II location capabilities are currently available while using towers in Bureau, Marshall, Stark, Putnam and Ford counties and the cities of Streator and Ottawa in La Salle County. If you have not upgraded to a new digital handset since November 30, 2004 your phone may not be able to utilize the Enhanced 911 Phase II **location capabilities** in the event of an emergency. As always, emergency calls to 911 can continue to be made from any cell phone. Please contact customer service for information.



## Summary of Charges for 815-488-3307.0 CAROL J GERMAN

Bill Date:08/23/05

Previous Balance	90.98
Payments received thru 08/22/05	90.88CR
Balance Forward	.10
Current Monthly Charges	76.98
Monthly Service Charges	59.90
Air Time Charges	5.39
Long Distance and/or Directory Assistance Charges	8.75
Travel Throughout North America	2.94
Taxes, Government Surcharges and Fees	11.20
Federal Tax	2.91
State Tax	6.79
Illinois State Wireless E-911 Surcharge	1.50
IVC Other Charges and Credits	20.00
Other Billing Adjustments	20.00

Total Amount Due by 09/14/05

108.28

Invoice Date	08/23/05
Account Number:	815-488-3307 0
Due Date:	09/14/05
Total Amount Due:	108.28



1802\*\*\*\*\*5-DIGIT 61350

CAROL J GERMAN

706 RIVER EDGE CIR

OTTAWA, IL 61350-9575





200 Riverfront Drive  
Marseilles, IL 61341

www.ivcellular.com

**Illinois Valley Cellular**

Return Service Requested

☐ Check here for change of address.

IV CELLULAR/PAM  
200 RIVERFRONT DR

MARSEILLES, IL 61341-9541



## Remittance Section

Bill Date: 10/09/06  
Account Number: 815-257-6202.0  
Payment Due By: 10/30/06  
Amount Due: 118.91  
Amount Enclosed: \$

Please make check payable to: Illinois Valley Cellular

☐ Check here for credit card payments(see reverse for details)



Illinois Valley Cellular  
P O Box 440  
Marseilles, IL 61341-0440

Payments not received by due date are subject to a \$10 late fee.

Please detach and return above portion with your payment



**Illinois Valley Cellular**

## Account Information

Invoice Date:	10/09/06
Account Number:	815-257-6202.0
Due Date:	10/30/06
Previous Balance:	109.98
Payments/Credits:	0.00
Balance Forward:	109.98
Late Payment Charge:	0.00
Current Charges:	8.93
Amount Due:	118.91

## Summary Of Charges

### Summary of Charges for IV CELLULAR/PAM

Previous Balance	109.98
Payments received thru 10/08/06	0.00
<b>Balance Forward</b>	<b>109.98</b>

### Current Monthly Charges

Monthly Service Charges	14.95
Long Distance and/or Directory Assistance Charges	5.00
Travel Throughout North America	54.55
Chargeable Text Messages and Downloads	20.75
<b>Total Current Monthly Charges</b>	<b>95.25</b>

### Taxes, Government Surcharges and Fees

State Tax	6.68
Local Tax	5.73
Illinois State Wireless E-911 Surcharge	11.25
<b>Total Taxes, Government Surcharges and Fees</b>	<b>23.66</b>

### IVC Other Charges and Credits

Other Billing Adjustments	-109.98
<b>Total IVC Other Charges and Credits</b>	<b>-109.98</b>
<b>Total Amount Due by 10/30/06</b>	<b>118.91</b>

## Important Messages

**TO SHARE OR NOT TO SHARE!!**

**YOU ASKED US!!! WE HEARD YOU!!!!**

Illinois Valley Cellular customers now have the option to allow concession and promotional minutes to share with their other lines!

*Call customer service at 1-800-438-4824 or 611 from your cell phone for details and to activate this new feature!*

## TECHNOLOGY UPGRADE

IVCellular will be making a major upgrade to its switching facilities during the month of October and November. The new digital technology will ensure that you will continue to enjoy the excellent service and enhanced feature offerings that you have come to expect from us both now and well into the future. While we are taking great care to make the migration to the new technology as smooth as possible for our customers, some intermittent interruption of service may occur. We thank you in advance for your patience.

## GPS HANDSET NOTICE

The FCC has mandated that all cellular handsets be GPS/E911 capable by the end of October 2006. Many of you have already updated your handsets in the last year, but there are still some who need to do so. As cellular networks are upgraded, handsets without this capability will no longer be able to place or receive calls in all areas. Please contact your local Retail Agent or call Customer Service at 611 from your cellular phone to verify that your handset is in compliance with this new FCC ruling. It is important to IVC that you have the proper equipment to enjoy your wireless service with the security that you deserve.

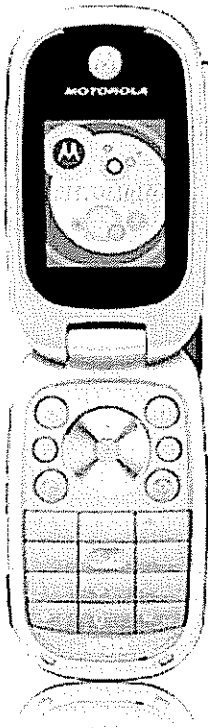
Free Phone and CDMA Upgrade Offers



# FREE Motorola w315 Flip phone

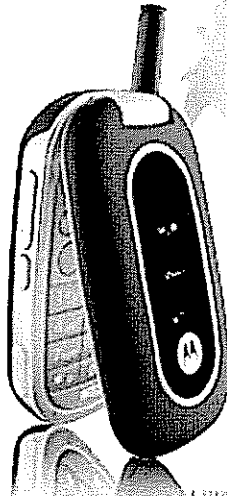
+ 3 month free data package trial

\*on 39.99 plan with 2 year contract

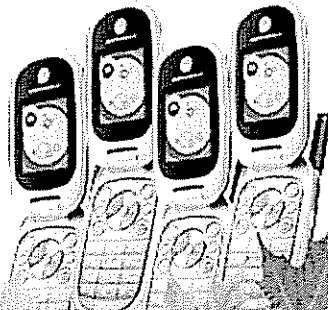


## Motorola w315

- Soothing Soft Touch Clamshell design
- Unique Style & Finish
- Vibrant Wide Color Display
- External Vertical Display
- Enhanced Messaging
- Integrated Speakerphone
- Brew Enabled



ADD A LINE for everyone  
in your family! **\$9.99\***  
\*\$9.99 each for the 1st 12 months.  
Thereafter \$16.99 per month per line.  
each  
Up to 4 lines





**ILLINOIS VALLEY CELLULAR**  
**1-800-438-4824** **www.ivcellular.com**

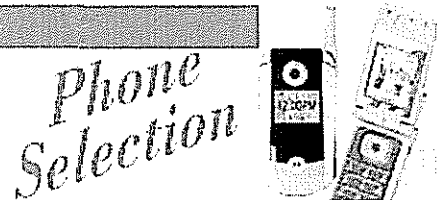
**Phones Plans & Service to fit YOUR needs!**



**Illinois Va**

[Services & Features](#)
[Support](#)
[About Us](#)
[Online Services](#)
[Fun & Games](#)
[Sales Locations](#)
[0](#)

## Service & Features



### Palm



#### Treo 650

Bat. Standby Time...up to 12.5 days  
 Bat. Talk Time...up to 4.5 hrs  
 Weight...6.3 oz.  
 Color Screen  
 Caller ID  
 email  
 Web Browser  
 MMS  
 1.3 megapixel Camera w/flash & zoom  
 video recorder  
 Built-in QWERTY keyboard  
 Integrated speakerphone  
 SD memory card slot  
 Text Messaging  
 Vibrate Option  
 Bluetooth wireless connectivity  
 Event Calender/Reminders  
 built-in MP3 player  
 Headset Jack  
 Hands Free Kit  
 Call Restriction  
 GPS



[View Manual](#)

### Nokia



#### 6265

Bat. Standby Time...up to 12 days  
 Bat. Talk Time...up to 3.5 hrs  
 Weight...3.49 oz.  
 Color Screen  
 Outside secondary display  
 Caller ID  
 WAP Browser  
 Brew

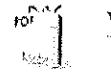


#### 6019

Bat. Standby Time...up to 12 days  
 Bat. Talk Time...up to 3.5 hrs  
 Weight...3.49 oz.  
 Color Screen  
 Caller ID  
 Brew  
 250 Memo  
 Text Messaging

MMS  
 2 megapixel Camera w/flash & zoom  
 Landscape mode shoot (like actual camera)  
 video recorder  
 Integrated speakerphone  
 24 MB of embedded Memory  
 Mp3 player/FM stereo  
 Text Messaging  
 Voice Activated Dialing  
 Bluetooth wireless connectivity  
 MP3, MIDI, & video ringtones  
 Event Calender/Reminders  
 Headset Jack  
 Hands Free Kit  
 Call Restriction  
 GPS

Vibrate On  
 16 Ringer  
 Voice Acti  
 Event Cal  
 Headset Ja  
 Hands Fre  
 Speaker P  
 Call Restr  
 GPS



[View Manual](#)

3155i



Bat. Standby Time...up to 10 days  
 Bat. Talk Time...up to 4 hrs  
 Weight...3.93 oz.  
 Color Screen  
 Practical mini display Caller ID  
 WAP Browser  
 Brew  
 MMS  
 Downloadable Polyphonic  
 Music Tones  
 Video/audio playback  
 Integrated Speakerphone  
 500 Memory Locations  
 Text Messaging  
 Vibrate Option  
 Voice Activated Dialing  
 Built-in FM Radio  
 Event Calender/Reminders  
 Headset Jack  
 Hands Free Kit  
 Speaker Phone  
 Call Restriction  
 GPS



[View Manual](#)

## Kyocera

Strobe

KX12

Bat. Standby Time...up to 8.3 days  
 Bat. Talk Time...up to 3.3 hrs

Bat. Stand  
 days



Weight...4.1 oz.  
 Color Screen  
 Hidden Full QWERTY keypad  
 Caller ID  
 WAP Browser  
 Brew  
 MMS  
 VGA Camera w/flash  
 Integrated speakerphone  
 Text Messaging  
 Voice Activated Dialing  
 Bluetooth wireless connectivity  
 Built-in polyphonic ring tones  
 Event Calender/Reminders  
 speakerphone  
 Headset Jack  
 Hands Free Kit  
 Call Restriction  
 GPS



[View Manual](#)



Bat. Talk Time...up to 3.5 hrs  
 Weight...4.1 oz.  
 Color Screen  
 Rugged and  
 Enhanced  
 resistance  
 protective  
 Caller ID  
 WAP Browser  
 Brew  
 MMS  
 Integrated  
 Text Messaging  
 Voice Activated  
 Built-in polyphonic  
 Event Scheduler  
 Stopwatch  
 Flashlight  
 Headset Jack  
 Hands Free Kit  
 Call Restriction  
 GPS



**KX16 Candid**

Bat. Standby Time...up to 7 days  
 Bat. Talk Time...up to 3.5 hrs  
 Weight...3.9 oz.  
 Caller ID  
 WAP Browser  
 Vivid Color screen with external  
 caller ID  
 Brew  
 Integrated VGA camera  
 200 Memory Locations  
 Text Messaging  
 Vibrate Option  
 Polyphonic (MIDI) ringers  
 Voice Activated Dialing  
 Event Calender/Reminders  
 Headset Jack  
 Hands Free Kit  
 Speaker Phone  
 GPS



[View Manual](#)

**Motorola**

**W315**

**V323**



Bat. Standby Time...up to 8.83 days  
 Bat. Talk Time...up to 3.53 hrs  
 Weight...3.53 oz.  
 Color Screen  
 External Vertical display  
 Soothing soft touch Design  
 Unique Style & Finish  
 Caller ID  
 WAP Browser  
 Brew  
 MMS  
 Integrated speakerphone  
 1000 Memory Locations  
 Text Messaging  
 Vibrate Option  
 Voice Activated Dialing  
 Event Calender/Reminders  
 polyphonic ringtones  
 headset Jack  
 Hands Free Kit  
 Call Restriction  
 GPS



Bat. Stand  
 days  
 Bat. Talk  
 Weight...3  
 Color Scre  
 Outside se  
 Caller ID  
 WAP Brov  
 Brew  
 MMS  
 Integrated  
 Integrated  
 Situationa  
 500 Memo  
 Text Mess:  
 Vibrate Oj  
 Voice Acti  
 Event Cal  
 MP3/poly  
 headset Ja  
 Hands Fre  
 Call Restr  
 GPS



[View Manual](#)



### Razr V3C

Bat. Standby Time...up to 8.3 days  
 Bat. Talk Time...up to 3.3 hrs  
 Weight...3.49 oz.  
 Color Screen  
 Outside secondary display  
 Caller ID  
 WAP Browser  
 Brew  
 MMS  
 1.3 megapixel Camera w/flash & zoom  
 video recorder  
 Integrated speakerphone  
 30 MB of embedded Memory  
 Text Messaging  
 Vibrate Option  
 Voice Activated Dialing  
 Bluetooth wireless connectivity  
 polyphonic/Music tones (MP3 format)  
 Event Calender/Reminders  
 Headset Jack  
 Hands Free Kit  
 Call Restriction  
 GPS



### V265

Bat. Stand  
 days  
 Bat. Talk  
 Weight...3  
 Color Scre  
 Outside se  
 Caller ID  
 WAP Brov  
 Brew  
 MMS  
 Integrated  
 Integrated  
 500 Memo  
 Text Mess:  
 Vibrate Oj  
 Voice Acti  
 Event Cal  
 64 level po  
 Headset Ja  
 Hands Fre  
 Call Restr  
 GPS



[View Manual](#)





**V262**

Bat. Standby Time...up to 12 days  
Bat. Talk Time...up to 3.5 hrs  
Weight...3.68 oz.  
Color Screen  
Outside secondary display  
Caller ID  
WAP Browser  
Brew  
MMS  
Integrated speakerphone  
500 Memory Locations  
Text Messaging  
Vibrate Option  
Voice Activated Dialing  
Event Calender/Reminders  
64 level polyphonic sound  
Headset Jack  
Hands Free Kit  
Call Restriction  
GPS

[\*\*View Manual\*\*](#)**LG****LG 5000**

Bat. Standby Time...up to 6 days  
Bat. Talk Time...up to 3.1 hrs  
Weight...3.35 oz.  
Color Screen  
Caller ID  
WAP Browser  
Brew  
MMS  
VGA Camera w/flash & video recorder  
External Display  
499 Memory Locations  
Text Messaging  
Vibrate Alert  
40 Present ringtones  
32-chord polyphonic  
Voice Activated Dialing  
Voice Command  
Event Calender/Scheduler  
Headset Jack  
Hands Free Kit

**GPS Enabled**



**[View Manual](#)**

**[Click here for support on older phone models](#)**

[Home](#) | [Service & Features](#) | [Support](#) | [About Us](#)

## DECLARATION

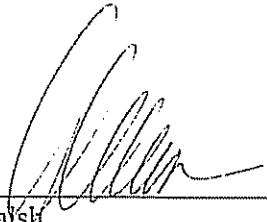
I, Tom Walsh, hereby state and declare:

1. I am Manager of Illinois Valley Cellular RSA 2-I Partnership, Illinois Valley Cellular RSA 2-II Partnership and Illinois Valley Cellular RSA 2-III Partnership (collectively "Illinois Valley Cellular"), wireless telecommunications services operators and the joint Petitioner herein.

2. I am familiar with the facts contained in the foregoing "Request For Additional Limited Waiver And Extension Of The Handset Penetration Deadline Of The Commission's Phase II E911 Rules" and I verify that those facts are true and correct to the best of my knowledge and belief, except that I do not and need not attest to those facts which are subject to official notice by the Commission.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 18<sup>th</sup> day of October, 2006.

  
\_\_\_\_\_  
Tom Walsh  
Manager